

EXHIBIT 6

From: [Kaiser, Steven J.](#)
To: [Katie Van Dyck](#); [Vicky Sims](#); [Cary, George S.](#); ["alcollins@cgsh.com"](#)
Cc: [Varsity Litigation](#); [pcoggins@lockelord.com](#); [bgaffney@lockelord.com](#); ["Ronnie Spiegel"](#); ["Katharine Malone \(kmalone@saverilawfirm.com\)"](#); [Elissa A. Buchanan](#); ["Robert Falanga"](#); ["Kobelah Bennah"](#); [Eric L. Cramer](#); [Karen Garvey](#); [Veronica Bosco](#); ["Michael Kane"](#)
Subject: RE: NOTICE OF DEPOSITION PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30(B)(6) OF DEFENDANTS VARSITY BRANDS, LLC, VARSITY SPIRIT, LLC, AND VARSITY SPIRIT FASHION & SUPPLIES, LLC
Date: Monday, January 31, 2022 5:08:52 PM

Dear Ms. Van Dyck:

Obviously Varsity disagrees and notes Plaintiffs' non-response to the many essentially identical cases cited in our letter of January 12. Varsity is confident the Court would likewise conclude that Plaintiffs' 30(b)(6) topics, both individually and collectively, are improper and deny any motion to compel based on them.

That said, in its letter of January 12, Varsity offered to "meet and confer regarding such topics in an effort to move forward with an appropriately scoped deposition." Varsity requested, for efficiency's sake, that Plaintiffs identify appropriate topics in writing in advance. It appears that Plaintiffs are unwilling to do that. That issue notwithstanding, Varsity will honor its offer otherwise reserving its rights.

As an aside, Varsity finds Plaintiffs' demand for a response the same business day, particularly when Plaintiffs waited nearly three weeks to respond to our letter and then did so in only the most dismissive and cursory of fashions, to be inappropriate and at the very least discourteous. Although in this instance we have complied with your demand, that compliance should in no way be construed as accepting such demands as appropriate or an indication that Varsity will comply with similar demands in the future.

Best regards,

Steven J. Kaiser
 Cleary Gottlieb Steen & Hamilton LLP
 2112 Pennsylvania Avenue, NW
 Washington, DC 20037
 T: +1 202 974 1554
skaiser@cgsh.com | clearygottlieb.com

From: Katie Van Dyck <kvandyck@cuneolaw.com>
Sent: Monday, January 31, 2022 11:01 AM
To: Kaiser, Steven J. <skaiser@cgsh.com>; Vicky Sims <Vicky@cuneolaw.com>; Cary, George S. <g Cary@cgsh.com>; 'alcollins@cgsh.com' <alcollins@cgsh.com>
Cc: Varsity Litigation <VarsityLitigation@cuneolaw.com>; pcoggins@lockelord.com; bgaffney@lockelord.com; 'Ronnie Spiegel' <rspiegel@saverilawfirm.com>; 'Katharine Malone (kmalone@saverilawfirm.com)' <kmalone@saverilawfirm.com>; Elissa A. Buchanan <EABuchanan@saverilawfirm.com>; 'Robert Falanga' <Robert@FalangaLaw.com>; 'Kobelah Bennah' <Kobelah@FalangaLaw.com>; Eric L. Cramer <ecramer@bm.net>; Karen Garvey

<KGarvey@labaton.com>; Veronica Bosco <VBosco@labaton.com>; 'Michael Kane'
<mkane@bm.net>

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LLC

Steve,

Plaintiffs have reviewed your letter regarding the 30(b)(6) notice served on November 15, 2021. We do not intend to withdraw the notice. It appropriately reflects the scope of the three related actions and the additional time already allotted by the Court for Varsity's 30(b)(6) deposition. If Varsity is not willing to meet and confer regarding the proposed topics, we will file a motion to compel with the Court. Please let us know your position by COB today.

Best regards,

Katie

From: Kaiser, Steven J. <skaiser@cgsh.com>

Sent: Wednesday, January 12, 2022 1:27 PM

To: Vicky Sims <Vicky@cuneolaw.com>; Cary, George S. <gcary@cgsh.com>; 'alcollins@cgsh.com'
<alcollins@cgsh.com>

Cc: Varsity Litigation <VarsityLitigation@cuneolaw.com>; pcoggins@lockelord.com;
bgaffney@lockelord.com; 'Ronnie Spiegel' <rspiegel@saverilawfirm.com>; 'Katharine Malone'
(kmalone@saverilawfirm.com)' <kmalone@saverilawfirm.com>; Elissa A. Buchanan
<EABuchanan@saverilawfirm.com>; 'Robert Falanga' <Robert@FalangaLaw.com>; 'Kobelah Bennah'
<Kobelah@FalangaLaw.com>; Eric L. Cramer <ecramer@bm.net>; Karen Garvey
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LLC

Please see the attached.

Steven J. Kaiser

Cleary Gottlieb Steen & Hamilton LLP

2112 Pennsylvania Avenue, NW

Washington, DC 20037

T: +1 202 974 1554

skaiser@cgsh.com | clearygottlieb.com

From: Vicky Sims <Vicky@cuneolaw.com>

Sent: Wednesday, January 12, 2022 10:23 AM

To: Kaiser, Steven J. <skaiser@cgsh.com>; Cary, George S. <gcary@cgsh.com>; 'alcollins@cgsh.com' <alcollins@cgsh.com>

Cc: Varsity Litigation <VarsityLitigation@cuneolaw.com>; pcoggins@lockelord.com; bgaffney@lockelord.com; 'Ronnie Spiegel' <rspiegel@saverilawfirm.com>; 'Katharine Malone' (<kmalone@saverilawfirm.com>) <kmalone@saverilawfirm.com>; Elissa A. Buchanan <EABuchanan@saverilawfirm.com>; 'Robert Falanga' <Robert@FalangaLaw.com>; 'Kobelah Bennah' <Kobelah@FalangaLaw.com>; Eric L. Cramer <ecramer@bm.net>; Karen Garvey <KGarvey@labaton.com>; Katie Van Dyck <kvandyck@cuneolaw.com>; Veronica Bosco <VBosco@labaton.com>; 'Michael Kane' <mkane@bm.net>

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Counsel,

We write to schedule a meet-and-confer on the attached notice. Please provide some times you are available this week or early next week. Thank you.

From: Vicky Sims

Sent: Monday, November 15, 2021 5:02 PM

To: Kaiser, Steven J. <skaiser@cgsh.com>; Cary, George S. <gcary@cgsh.com>; 'alcollins@cgsh.com' <alcollins@cgsh.com>

Cc: Varsity Litigation <VarsityLitigation@cuneolaw.com>; pcoggins@lockelord.com; bgaffney@lockelord.com; 'Ronnie Spiegel' <rspiegel@saverilawfirm.com>; 'Katharine Malone' (<kmalone@saverilawfirm.com>) <kmalone@saverilawfirm.com>; 'Robert Falanga' <Robert@FalangaLaw.com>; 'Kobelah Bennah' <Kobelah@FalangaLaw.com>; Eric L. Cramer <ecramer@bm.net>; Karen Garvey <KGarvey@labaton.com>; Katie Van Dyck <kvandyck@cuneolaw.com>; Veronica Bosco <VBosco@labaton.com>; 'Michael Kane' <mkane@bm.net>

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Counsel,

Please see the attached 30(b)(6) Notice.

Victoria Sims, Esquire
Cuneo Gilbert & LaDuca
4725 Wisconsin Avenue NW, Suite 200
Washington, DC 20016
Phone: (202) 789-3960
Direct: (202) 449-3958

Fax: (202) 789-1813

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